REMARKS

Claims 1-4 are currently pending, all of which have been rejected. In particular, claim 3 is rejected under 35 U.S.C. §112, ¶2 due to an insufficient antecedent basis; claims 1-3, 5-10, and 12-14 are rejected under 35 U.S.C. §103(a) as being anticipated by Wong et al. (US 6,708,172) in view of Dunlap et al. (US 6,560,637); and claims 4 and 11 are rejected under 35 U.S.C. §103(a) as being unpatentable over Wong in view of Dunlap and further in view of Suzuki et al. (US 6,573,912). Applicant respectfully traverses these rejections.

As a preliminary matter, in rejecting claim 3 due to an insufficient antecedent basis, the Examiner points to the term "the media engine." Claim 3 depends from claim 2 which is where the antecedent basis is found. The first line of claim 2 recites "The system recited in claim 1, further comprising ***a media engine***." Given that the antecedent basis is sufficient, Applicant requests withdrawal of the rejection of claim 3.

Additionally, the Applicant located a typographical error in claim 1. The word "the" was inadvertently repeated in the presenter computer element. Claim 1 has been amended accordingly.

Turning to the prior art rejections, Wong serves as the primary reference for the rejection of all of the pending claims. As a general note, Wong is directed to a system for a plurality of users to share a web browser. There is no distinction in Wong between users with respect to control of communications. In contrast, the recited claims distinguish between a presenter who controls the collaboration and the participants in the collaboration as recited in the claims. An analysis of individual claim elements demonstrates further deficiencies in Wong.

With respect to the presenter computer and participant computer recited in claim 1, Wong fails to each either. In particular, the user computers (client 410) of Wong, which presumably is the element the Examiner seeks to equate to the recited presenter computer and participant computers (the Examiner did not explicitly identify any particular element in Wong), do not have a presenter-participant relationship. This is evident from the failure of Wong to teach the different graphical user interfaces (GUI) of the presenter and participant computers. As recited, the presenter computer has a GUI "to control the display of a presentation, authorize participants to pose a question, and respond to the question." The recited participant computer has a GUI "for viewing the

presentation, requesting permission to pose the question, and generating the question." The text in Wong cited by the Examiner (col. 6, line 30 to col. 7, line 5) only discusses a single type of user, where all of the users can chat as they browse and shop. In other words, a chat session is discussed within the context of a web-browsing environment. The language cited by the Examiner does mention that one computer has a different GUI than another. Further, there is no teaching, for example, of controlling the display of a presentation, authorizing a participant to pose a question, or a participant requesting permission to pose a question.

As for the recited system server, Wong fails to teach any of the recited components. For example, the recited system server includes a whiteboard application. The Examiner cites to Wong (col. 3, lines 30-52) as teaching a system server with a whiteboard application. However, the cited text fails to make any mention of a whiteboard application. Rather, the cited text relates to a browser environment where users can see the presence of other users and engage in chat sessions. The Examiner has already apparently cited the chat session as equating to the presentation aspect of the GUI's on the presenter and participant computer, thus the Examiner cannot equate the chat session to the recited whiteboard application as well.

The recited system server also includes a web server application. The Examiner cites to the network servers in Wong (col. 4, lines 3-12), which are discussed in detail in Wong starting at col. 14, line 36. While the Examiner did not identify the element in Wong that he believes corresponds to the recited system server, the Applicant assumes that the Examiner, if he did, would cite to server 450 of Wong or perhaps more specifically to spatial web content server 452.

Wong indeed does teach a type of web server as Wong's server 450 has a spatial web content server 452 from which HTML content is retrieved for display at client 410. However, Wong does not teach the recited web server application which "controls receipt of commands from the presenter graphical user interface, push of controls to the participant graphical user interfaces and storage of the universal image format file for transmission to the participant graphical user interface." The spatial web content server 452 of Wong is for associating users to one another in a web browser, not facilitating control of a presentation. Indeed, none of the recited functionality of the

web server application is found in spatial web content server 452 of Wong. Additionally, Wong does not teach any storage of a universal format file.

The recited system server also includes a database in which the application specific presentation file is stored. The Examiner cites to Wong (col. 9, lines 50-65) as teaching this element. However, the cited text discusses a database storing content for plot 304, which is a collection of contiguous cells that host an application or content. There is no correlation between plot 304 of Wong and the recited application specific presentation file. Moreover, there is no discussion in the cited text of presentation files, let along application specific presentation files.

With respect to claim 2, the Examiner cites to Wong at col. 14, lines 5-14. The cited text pertains to audio associated with plots, proxies, and groups connected with spatial locations. While this text does not teach a media engine, assuming *arguendo* that this is the case, the audio taught in Wong appears to be resident on spatial web content server 452 and is not delivered from the presenter computer to the plurality of participants as recited in claim 2. The recited language is due to the nature of the recited invention being for presentation from a presenter to participants, which is not taught by Wong. Moreover, Wong provides no teaching with respect to an IP tunnel as recited in claim 2.

With respect to claim 3, the Examiner cites to col. 23, lines 20-56 of Wong. The cited text describes the maps (mini, local, and global) that are navigated by users. The cited text is simply irrelevant to the claim, as the cited text does not contain any discussion of IP channels.

With respect to claim 5, the Examiner cites to col. 25, lines 14-20. Again, the cited text is irrelevant to the claim. The cited text relates to a user navigating through a web page presented by the Wong system. Annotation of a whiteboard as recited is not found in the cited text. There is no teaching in Wong of any mechanism that allows for the annotation of the displayed presentation, let alone a discussion of a whiteboard application that provides tools to create annotations.

With respect to claim 6, as discussed above with respect to claim 5, Wong fails teach a mechanism for annotations of a presentation, let alone that these annotations that Wong does not teach are received and transmitted by the system server.

Moreover, the Examiner's inherency argument cannot stand as the Examiner addresses the transmittal of comments rather than annotations as recited in the claim.

With respect to claim 7, neither Wong (as previously discussed) nor Dunlap teaches a whiteboard application. While Dunlap does teach a web-enabled presentation device, Dunlap does not teach further conversion of the universal format file to an image stream as recited in the claim.

With respect to claim 8, while claim 8 differs in scope from claim 1, the Examiner has applied the same rational to reject claim 8 as applied to claim 1. Therefore, the Applicant refers the Examiner to the arguments above made with respect to claim 1.

With respect to claim 9, the Examiner cites to Wong at col. 14, lines 5-14. The cited text pertains to audio associated with plots, proxies, and groups connected with spatial locations. While this text does not teach a media engine, assuming *arguendo* that this is the case, audio taught in Wong appears to be resident on spatial web content server 452 and is not delivered from the presenter computer to the plurality of participants as recited in claim 9. The recited language is due to the nature of the recited invention being for presentation from a presenter to participants, which is not taught by Wong. Moreover, Wong provides no teaching with respect to an IP tunnel as recited in claim 9.

With respect to claim 10, Wong does not teach a first IP tunnel let alone a second IP tunnel. Moreover, the text of Wong (col. 3, lines 30-50) cited by the Examiner) makes no mention of the use of IP tunnels and simply discusses the general goal of Wong as being the provision of a shared multiple browser format.

With respect to claims 12-14, the Examiner has applied the same rational to reject these claims as applied to claims 5-7, respectively. While the claims 12-14 differ in scope from claims 5-7, the claims do contain similar language in the dependent elements. Therefore, the Applicant refers the Examiner to the arguments above made with respect to claims 5-7.

Turning to the rejection of claims 4 and 11 based upon Wong, Dunlap and Suzuki, Applicant respectfully asserts that Suzuki does not satisfy the deficiencies in Wong and Dunlap with respect to these claims. In relying on Suzuki, the Examiner cites to col. 5, lines 12-19 of Suzuki. While the cited text mentions use of MPEG encoding, there is no mention of where the media is processed. Thus, Suzuki fails to

teach "the media ... is processed only by media codecs ***resident on the presenter computer*** and the plurality of participant computers and is ***not processed by the system server***." (claim 4, *emphasis added*). Moreover, Suzuki only teaches a network server and a client. (See e.g., figure 2 of Suzuki). Thus, there is only a computer at the client and a computer at the studio. There is no presenter-participant relation that is controlled by a system server as recited in claim 4.

With respect to claim 11, the Examiner has applied the same rational to reject these claims as applied to claim 4. While claim 11 differs in scope from claim 4, the claims do contain similar language in the dependent elements. Therefore, the Applicant refers the Examiner to the arguments above made with respect to claims 4.

Lastly, the Applicant challenges the rejections under 35 U.S.C. §103 in that there are no motivation taught in Wong, Dunlap or Suzuki to combine Wong and Dunlap, and Wong, Dunlap and Suzuki in the manners asserted by the Examiner. Absent such a motivation in these references, the rejection under 35 U.S.C. §103 cannot stand.

Applicant respectfully submits that the pending claims are allowable, and requests a Notice of Allowance for this application. Should the Examiner believe that a telephone conference would expedite the prosecution of this application; the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

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Mitchell Rosenfeld
Reg. No: 36,258

Correspondence Address:
Capstone Law Group LLP
1810 Gateway Drive, Suite 260
San Mateo, CA 94404
Customer No. 31955
(650) 577-4500